

# **Rural Education Achievement Program: Small, Rural School Achievement Program and Rural and Low-Income School Program Application**

## **Supporting Statement Part A**

**OMB No. 1810-0646**

**Submitted by:**

Rural Education Achievement Program  
U.S. Department of Education

Fall 2019

## A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section. Please limit pasted text to no longer than 3 pages. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.**

The Department administers two grant programs under Title V, Part B (Rural Education Achievement Program (REAP): the Small, Rural School Achievement (SRSA) program (administered by the Department, which makes awards directly to local educational agencies (LEAs)) and the Rural and Low-Income School (RLIS) program (awarded by the Department to SEAs, which then make awards to and administer the program for LEAs, except that the Department may also make RLIS awards directly to LEAs in a State that do not submit an approvable RLIS application to the Department. The LEAs that apply directly to the Department under RLIS are known as Specially Qualified Agencies (SQAs)).

The information shared with the Department enables the Department to make eligibility determinations for LEAs and to calculate formula allocations for each eligible LEA. Form 1 consists of the REAP Eligibility Spreadsheet through which SEAs provide to the Department eligibility and allocation data for both the RLIS and SRSA programs. Form 2 consists of the application package for LEAs under the SRSA program. Form 3 consists of the application package for SQAs under the RLIS program. This proposed application package is an extension with no revision of current information collection package (OMB #1810-0646).

ESEA:

[§§5211-5232](#)

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information collected from SEAs through Form 1 is used on an annual basis to determine LEA eligibility for the programs and to allocate funds to eligible LEAs. The information from Forms 2 and 3 is used to process grant awards under the SRSA and RLIS programs.

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

SEAs and LEAs submit written responses via an online web portal.

4. **Efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.**

The REAP application forms do not duplicate any other information collection effort.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.**

Neither small businesses nor small entities are affected by this collection. Small LEAs are affected by this program. In order to minimize burden for these small entities, the Department proposes an application package that contains only required data.

6. **Consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If the data in Form 1 is not collected, the Department will be unable to make SRSA and RLIS grant awards, because it will not be able to determine eligibility or calculate formula allocations without data from SEAs and LEAs. Moreover, if LEAs do not submit Forms 2 or 3, the Department will not have a legal agreement on which to base grant

awards. Similarly, if Form 2 or 3 is not collected annually, the Department will be at risk of issuing grant awards to LEAs that have closed, or of entering into an agreement based on incorrect grantee information.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

None of the special circumstances apply to this collection.

**8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

On October 16, 2019, the Department published a 60-day FRN (Vol. 84, No. 200, page 55300) seeking public comment and received one non-substantive comment. The Department made minor, technical changes to Forms 1, 2, and 3 and will publish a 30-day FRN seeking public comments. No consultations outside of the public comment process were conducted for this collection.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.**

These data are collected from grantee SEAs and LEAs and subgrantee LEAs. No remuneration, outside of grant funds allocated to the SEAs and LEAs by formula, is made.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the ICRAS' Part 2 IC form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided. Requests for this information are in accordance with the following the Department and OMB policies: Privacy Act of 1974, OMB Circular A-108 - Privacy Act Implementation - Guidelines and Responsibilities, OMB Circular A-130 Appendix I - Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 - OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 - Safeguarding Personally Identifiable Information, OM:6-104 - Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information). If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.**

There has been no assurance of confidentiality provided to the respondents.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

Not applicable. This collection contains no questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in Question 12. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form. (The table should at minimum include Respondent types, Number of Respondents and Responses, Hours/Response, and Total Hours)**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Question 14.**

Approximately 49 SEA grantees and 6,015 LEA grantees interact with REAP during this information collection, over a multi-year period. We estimate the average burden per SEA is 40 hours. We estimate that Form 2 takes between 3 hours and 3 hours and 15 minutes to complete. The total annual estimated burden for all respondents for Form 2 is 18,045 - 18,666 hours (6,015 responses X 3 hours ; 6,015 response X 3 hours and 15 minutes). We estimate that Form 3 takes 1.5 hours to complete. Due to the potential variation in LEA responses and time to

complete we estimate that total burden hours could vary between 20,029 and 21,532. The burden differences across reporting entities are limited, so all entities are assigned the same estimated reporting burden of one full-time equivalent (FTE) per reporting entity.

Collection	Respondent Types	Annual Respondents	Responses	Hours per Respondent (52 weeks/year; 40 hours/week)	Total Hours
Form 1: RLIS and SRSA Data	SEAs	49	1 per respondent	40 hours per year	1,960 per year
Form 2: SRSA Application	LEA	6,015	1 per respondent	3 hours per year/ 3.25 hours per year	18,045 - 18,699 per year
Form 3: SQA Application	LEA	16	1 per respondent	1.5 hours per year	24 per year
Total		6,080			Average 20,683 per year

The annualized cost related to the respondent burden time is estimated to be \$1,034,150 (20,683 hours multiplied by an average wage of \$50 per hour). There is a wide range of hourly salaries associated with the professionals that participate in REAP activities, making this estimation approximate.

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Questions 12 and 14.)**

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public**

comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Question 12.

**Total Annualized Capital/Startup Cost:** None.

**Total Annual Costs (O&M):** None.

**Total Annualized Costs Requested:**

For the foreseeable future REAP applications will require no additional systems development efforts by SEAs or LEAs and there are no associated capital or startup costs.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Questions 12, 13, and 14 in a single table.

Approximately four full-time equivalents spend approximately 500 hours each on the processing of the forms and related activities including technical assistance to SEAs and LEAs. The annualized cost for the Federal Government is estimated to be \$100,000 (2,000 hours multiplied by an average wage of \$50 per hour). There is a wide range of hourly salaries associated with REAP Program Officers, making this estimation approximate.

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by



**type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).**

This is an extension with no burden change. However, there is an adjustment increase of 15 respondents that is based on the recalculation for better alignment.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used.**

Not applicable.

- 17. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Ongoing annual collection, starting November 2019.

- 18. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

Not applicable.

- 19. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.**

Not applicable.